

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF**

September 16, 2021

The Honorable Sarah Netburn, U.S. Magistrate Judge  
 United States District Court for the S.D.N.Y.  
 Thurgood Marshall U.S. Courthouse, Room 430  
 40 Foley Square  
 New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Netburn:

The Plaintiffs' Executive Committees write to respectfully request an additional week (from Sept. 17, 2021 until Sept. 24, 2021) to address the Court's inquiry at ECF Nos. 6909 and 7012. In light of a number of other ongoing events in the multidistrict litigation, the PECs have been unable to communicate with the large number of plaintiffs' counsel in the cases listed in Lists A and B within ECF No. 7012 to coordinate whether there are additional objections. We would also ask that plaintiffs' counsel responsible for the cases listed in Lists A and B within ECF No. 7012 communicate directly to the PECs c/o Robert Haefele ([rhaefele@motleyrice.com](mailto:rhaefele@motleyrice.com)) to identify any objections.

Respectfully submitted,

COZEN O'CONNOR

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 For the Plaintiffs' Exec. Committees

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 For the Plaintiffs' Exec. Committees

The Honorable Sarah Netburn

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For the Plaintiffs' Exec. Committees

cc: The Honorable George B. Daniels, via ECF  
All Counsel of Record via ECF